



U.S. Department
of Transportation
**Federal Highway
Administration**

May 05, 2012

Federal Highway Administration
200 North High Street, Room 328
Columbus, OH 43215

Federal Transit Administration, Region V
200 W. Adams St., Suite 320
Chicago, IL 60606

Ms. Donna Middaugh
Chair
Stark County Transportation Study (SCATS)
201 Third Street N.E., Suite 201
Canton, Ohio 44702

Dear Ms. Middaugh:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have completed a Certification Review of the transportation planning process for the Canton Urbanized Area. We appreciate the collegial cooperation shown to our review team by your staff in conducting this review and their continuing commitment to improve the transportation planning process in the Canton, Ohio region.

The review was performed in accordance with 23 U.S.C. 134, which requires a review of the transportation planning process for all metropolitan areas with a population of 200,000 or greater. The objective of the Certification Review was to determine whether the transportation planning process meets the Federal transportation planning requirements outlined in 23 CFR 450.300.

The enclosed report documents the results of the review. This report includes two commendations for noteworthy practices and four recommendations for enhancing the SCATS planning process.

The review team found that the transportation planning process for Canton, Ohio, as conducted by the Stark County Area Transportation Study (SCATS) meets the planning requirements. Therefore, the FHWA and FTA jointly certify the planning process.

A representative of the review team would like to present the primary results of this report at an upcoming Policy Committee meeting. Arrangements will be made with your staff. In the meantime, please contact Andy Johns of FHWA at (614) 280-6850 or Susan Weber of FTA at (312) 353-3888 if you have any questions regarding this certification action.

Sincerely,

For: Laurie Leffler
Division Administrator
Federal Highway Administration

Sincerely,

Marisol R. Simón
Regional Administrator
Federal Transit Administration

Enclosure

ecc: J. Dutton, SCATS
R. Nau, SCATS
J. Kinnick, ODOT District 4
M. Freed, ODOT Transit
D. Moore, ODOT
S. Phinney, ODOT
K. Conrad, SARTA
S. Weber, FTA - Region V
J. Blanton, FHWA-OH
L. Oesterling, FHWA-OH

**Certification Review
of the
Metropolitan Transportation Planning
Process
for the
Canton, Ohio
Transportation Management Area
Stark Area Transportation Study
(SCATS)**

**Federal Highway Administration
Federal Transit Administration**

May 2012



Table of Contents

	Page
Preface	ii
Executive Summary	iv
Introduction	1
Review Process	1
Desk Review	1
Site Visit	2
Resolution of the 2007 Recommendations	2
Other Issues Discussed During the Site Visit	3
Public Meeting	10
Closeout Meeting	10
Summary of Findings	11
U.S. DOT Certification and Follow-Up	13
Appendices	
Appendix A - Notification of Certification Review	
Appendix B - Post Desk Review Correspondence and Questions/Comments	
Appendix C - Site Visit Sign-In Sheets and Agenda	
Appendix D - Public Meeting Notice and Sign-In Sheet	

PREFACE

Pursuant to 23 U.S.C. 134 and 49 U.S.C. 5303, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify that the metropolitan transportation process of a transportation management area (TMA) is being carried out in accordance with applicable provisions of Federal law. A TMA is an urbanized area, as defined by the U.S. Census, with a population of over 200,000. This requirement began with the landmark Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) and continues today with the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users of 2005 (SAFETEA-LU).

Every four years, a certification review is conducted focusing on compliance with Federal regulations. Joint FHWA/FTA certification review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect local issues and needs. As a consequence, the scope and depth of each certification review varies.

It is important that the State DOT, MPO, and transit operators understand that the certification review is being done in the spirit of cooperation with the goal of enhancing the quality of the transportation planning process. FHWA and FTA approach the certification review as partners in the transportation planning process with a stewardship role of determining how well the planning process is functioning and to recommend improvements when appropriate.

The certification review process is only one of many activities used to assess the quality of the metropolitan planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Other activities provide opportunities for this type of review and comment, including: Unified Planning Work Program (UPWP) approval, Metropolitan and Statewide Transportation Improvement Program (TIP) findings, and air quality conformity determinations (in non-attainment and maintenance areas). These activities, as well as a range of other formal and informal contacts provide both FHWA and FTA an opportunity to observe and comment on the planning process. The results of these other processes are also considered during the certification review process.

As a result of the certification review, FHWA and FTA may take one of four actions as appropriate:

- 1) Jointly certify the transportation planning process;
- 2) Jointly certify the transportation planning process, subject to certain specified corrective actions;
- 3) Jointly certify the transportation planning process as the basis for approval of certain categories of programs or projects; or,
- 4) Non-certification of the transportation planning process.

The review also includes commendations and recommendations for improvements.

Commendations are given for noteworthy elements that demonstrate innovative, highly effective, well-thought-out procedures for implementing the planning requirements. Commendations also provide a way to identify and share successful practices with others.

Recommendations are suggested successful practices or technical improvements as opposed to mandatory changes pursuant to regulatory requirements. However, recommendations generally have a nexus to the planning regulations. While recommendations are not regulatory, FHWA and FTA are hopeful that State and local officials will consider taking some action.

Corrective Actions are items that fail to meet the requirements of the transportation statute and regulations, thus impacting the outcome of the overall process.

The primary difference between a Recommendation and Corrective Action is that, while the expected outcome of each is a change to the current process, the former addresses improvements that would be enhancements to the process but are not necessarily required by law. While the change suggested by a Recommendation is meant to improve the process, there is no Federal mandate, and failure to respond will not necessarily result in a more restrictive certification.

EXECUTIVE SUMMARY

The Federal Review Team concludes that the Stark County Area Transportation Study (SCATS), ODOT, and SARTA have made commendable efforts to demonstrate their implementation of SAFETEA-LU requirements in the continuous, cooperative, and comprehensive “3-C” planning process. Based upon the findings of this review, the Canton TMA transportation planning process is found to meet the requirements of the metropolitan planning regulations found in 23 CFR Part 450 Subpart C and 49 CFR Part 613. FTA and FHWA, therefore, jointly certify the transportation planning process for the Canton TMA.

This report documents the certification review process and indicates two commendations highlighting noteworthy practice as well as four recommendations to enhance the overall transportation planning process. These commendations and recommendations are listed below.

Commendations:

Commendation 1: SCATS is commended for its project-level documentation of long-term debt (i.e. State Infrastructure Bank (SIB) loans) within its TIP. This complete financial data is essential for demonstrating and maintaining a fiscally constrained program. This transparency also provides a benefit to the public, allowing greater understanding of the federal funds that are available for transportation investments as the region prepares for future needs.

Commendation 2: SCATS continuously incorporates safety performance measures within their transportation planning process resulting in meaningful decisions regarding transportation investments for the region.

Recommendations:

Recommendation 1: SCATS, SARTA, and ODOT should update their various agreements and prospectus to include specific provisions for cooperatively developing and sharing information related to the development of financial plans that support the metropolitan transportation plan and the TIP, as required by 23 CFR 450.314(a).

Recommendation 2: In developing the 2014-2017 TIP, SCATS should show the total estimated cost of each project, as required by 23CFR450.324(e)(2). Total estimated costs include those costs associated with the project, including those phases that may occur in previous or later years beyond the four-year TIP. SCATS is encouraged to review other Ohio MPO TIP formats for examples of how to meet this requirement. Failure to include this information in the next TIP could result in a corrective action and/or FHWA & FTA withholding approval of the 2014-2017 TIP. The Federal Review team opted not to issue a corrective action now, knowing that the new TIP would be developed within the next 8-12 months.

Recommendation 3: SCATS should demonstrate fiscal constraint by year for its

entire program of projects. In particular, Table 4-2 in the 2012-2015 TIP should be revised to eliminate negative balances in SCATS sub-allocated funding programs (STP, CMAQ, and TE) as is shown for FY 2013. Additionally Table 4-1 should be consistent with Table 4-2, in that the revenues and costs (particularly those associated with SCATS sub-allocated funds) should be accurately reflected.

Recommendation 4: Resolutions amending the TIP should list sufficient descriptive material to identify each project being amended regardless of project type (highway or transit). This identifying information should be included within the resolution language and not as an attachment. Including the project information as part of the signed resolution allows SCATS to demonstrate that the board has taken action on specific projects; attachments can be separated and/or changed.

INTRODUCTION

Every four years, a certification review is conducted for a transportation management area (TMA) to ensure the metropolitan transportation planning process is being carried out in accordance with applicable provisions of Federal law. This report documents the certification review of the Stark County Area Transportation Study (SCATS) metropolitan planning organization. This certification review was accomplished within the spirit of cooperation between SCATS, the Ohio Department of Transportation (ODOT), and the transit operator (SARTA) with the goal of enhancing the quality of the transportation planning process in the Canton area.

This certification review process is only one of many activities used to assess the quality of the metropolitan planning process. Through periodic discussions and collaboration with SCATS, the FHWA Ohio Division Office and FTA Region V remain informed of current transportation planning activities, plans, and projects in the region.

REVIEW PROCESS

The SCATS certification review process consisted of three major components: a desk review, a site visit, and a meeting with the public. The initial notification of the certification review letter to SCATS outlining the process is included in Appendix A. A discussion of these activities follows.

DESK REVIEW

A desk review was conducted in preparation for the site visit by FHWA and FTA on February 7, 2012. This consisted of reviewing SCATS' current major transportation planning products, i.e., UPWP, TIP and MTP. Based upon this review, the Federal Review Team determined that the certification review would consist generally of a follow-up to the recommendations made during the 2007 certification review in addition to the following topics:

- Agreements and Contracts
- Financial Planning
- Transportation Planning Safety
- Coordination and Public Transit
- Air Quality Planning
- Title VI and Environmental Justice
- Unified Planning Work Program Development
- Integrating Freight in the Transportation Planning Process

Appendix B contains an email delivered to SCATS' Technical Director Jeff Dutton after the desk review in order to prepare for the site visit that included a draft agenda and questions/comments for SCATS. SCATS concurred with the site visit draft agenda on February 23, 2012 without any changes to the draft agenda. The finalized site visit agenda is in Appendix C. SCATS returned responses to questions/comments on March 22, 2012. Those responses are included in Appendix B.

SITE VISIT

The site visit portion of the review took place on March 26 and 27, 2012 at the SCATS offices in Canton, Ohio. The Federal Review Team consisted of the following individuals:

Federal Highway Administration – Ohio Division

Leigh Oesterling, Planning and Environmental Team Leader

Andy Johns, Planning Specialist

Federal Transit Administration – Region V Office

Susan Weber, Community Planner

Jeff Dutton, Technical Director was present during the site visit as were other staff members of SCATS. Representatives from the Ohio Department of Transportation and representatives from the transit operator SARTA were also present. The site visit agenda and sign-in sheets are located in Appendix C. A summary of the topics discussed during the site review follows.

RESOLUTION OF THE 2007 CERTIFICATION REVIEW RECOMMENDATIONS

2007 Recommendation #1

In the next MTP update, it is recommended that SCATS revisit the amount of FTA Section 5307 funding available for the forecast period, include the local match and program the Section 5316 JARC and Section 5317 New Freedom Funds..

2011 Resolution

The 2010 update of the MTP made appropriate adjustments to the 5307, 5316 and 5317 funding as recommended.

2007 Recommendation #2

It is recommended that the MPO Update the regional ITS architecture, including farebox upgrades; and ensure that projects comply with the provisions of 23 CFR940.

2011 Resolution

SCATS is committed to updating the regional ITS architecture once a planned transit ITS project is defined and implemented as recommended.

OTHER ISSUES DISCUSSED DURING THE SITE VISIT

AGREEMENTS AND CONTRACTS

Regulatory Basis: 23 CFR 450.314(a) *The MPO, the State(s), and the public transportation operator(s) shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities shall be clearly identified in written agreements among the MPO, the State(s), and the public transportation operator(s) serving the MPA. To the extent possible, a single agreement between all responsible parties should be developed. The written agreement(s) shall include specific provisions for cooperatively developing and sharing information related to the development of financial plans that support the metropolitan transportation plan (see § 450.322) and the metropolitan TIP (see § 450.324) and development of the annual listing of obligated projects (see § 450.332).*

Status: SCATS has several agreements in place with the state (ODOT), the transit operator (SARTA), and the state air quality agency. The agreement with ODOT is renewed on a biennial basis, and was most recently executed on April 5, 2011. This agreement discusses in detail the processes related to developing and implementing the annual unified planning work program (UPWP). The agreement also references the MPO's prospectus. The prospectus (dated August 1997) describes how the state, MPO, and transit operators will carry out the transportation planning process for the Canton urbanized area, including some language regarding the sharing of information to develop transportation plans and programs.

The agreement between SCATS and SARTA was signed in 2009 and discusses the respective responsibilities of each agency in carrying out transportation planning for the metropolitan area. While the agreement generally describes the responsibilities of each agency in carrying out the transportation planning process, little detail is provided in how the agencies will share information related to the development of financial plans to support the planning process.

A Memorandum of Understanding setting forth the procedures for demonstrating air quality transportation conformity was signed by SCATS, ODOT, and Ohio Environmental Protection Agency (OEPA) in 2008. Additionally, an agreement exists between SCATS and its bordering MPOs (Akron Metropolitan Area Transportation Study (AMATS) and Eastgate, the MPO for the Youngstown urbanized area). This agreement, signed in 2003, describes how the three MPOs will coordinate their planning efforts, share technical data, and participate in a cooperative process for regional transportation concerns.

Findings: SCATS, SARTA, and ODOT have entered into various agreements generally describing their respective roles in carrying out the transportation planning process.

Recommendation 1: SCATS, SARTA, and ODOT should update their various agreements and prospectus to include specific provisions for cooperatively developing

and sharing information related to the development of financial plans that support the metropolitan transportation plan and the TIP, as required by 23 CFR 450.314(a).

FINANCIAL PLANNING & TRANSPORTATION IMPROVEMENT PROGRAM

Regulatory Basis: Per 23 CFR 450.324, the MPO is required to develop a Transportation Improvement Program (TIP) in cooperation with the State and public transit operators. Specific requirements are listed under this section including part (e) which states, “*The TIP shall include, for each project or phase. . .the following: (1) Sufficient descriptive material (i.e. type of work, termini, and length) to identify project or phase; 2) Estimated total project cost, which may extend beyond the four years of the TIP; and part (h) which states, “The TIP shall include a financial plan that demonstrates how the approved TIP can be implemented, indicates resources from public and private sources that are reasonably available to carry out the TIP, and recommends and additional financial strategies for needed projects and programs. In developing the TIP, the MPO, State(s), and public transportation operators shall cooperatively develop estimates of funds that are reasonably expected to be available to support TIP implementation. . .” and part (i) which states, “. . . For the TIP, fiscal constraint shall be demonstrated and maintained by year. . .”*”

Status: SCATS has a four year TIP that is developed in cooperation with the State and public transit operator. The current TIP covers state fiscal years 2012 through 2015. It is expected that SCATS will update their TIP to 2014-2017 within the next 8-12 months. The SCATS TIP includes all regionally significant projects, regardless of funding source, and projects within the TIP are consistent with SCATS’ metropolitan transportation plan.

SCATS relies heavily on ODOT and SARTA to provide the project description and cost estimates for their respective sponsored projects. SCATS believes that ODOT and SARTA have sufficient funds available for their requested projects, but there is rarely discussion regarding this requirement. For amendments, SCATS relies on ODOT and SARTA to maintain fiscal constraint and determine project eligibility. SCATS works closely with ODOT District 4 in developing and implementing the TIP, including holding quarterly meetings to discuss project schedules, delays, or other issues. During the review there was much discussion about the need for SCATS to provide an evaluation of projects, regardless of project sponsor, to determine whether requested projects are consistent with the goals and objectives of the transportation plan, whether projects are eligible for specific federal funds, and whether the entire program of projects maintains fiscal constraint by year. SCATS should continue its close working relationship with ODOT District 4, ODOT Office of Transit and SARTA, as these relationships foster the cooperative process that is needed to carry out the transportation planning process for the region.

Findings: SCATS has a four year TIP that is developed in cooperation with the State and public transit operators.

Commendation 1: SCATS is commended for its project-level documentation of long-term debt (*i.e. State Infrastructure Bank (SIB) loans*) within its TIP. This complete financial data

is essential for demonstrating and maintaining a fiscally constrained program. This transparency also provides a benefit to the public, allowing greater understanding of the federal funds that are available for transportation investments as the region prepares for future needs.

Recommendation 2: In developing the 2014-2017 TIP, SCATS should show the total estimated cost of each project, as required by 23 CFR 450.324(e)(2). Total estimated costs include those costs associated with the project, including those phases that may occur in previous or later years beyond the four-year TIP. SCATS is encouraged to review other Ohio MPO TIP formats for examples of how to meet this requirement. Failure to include this information in the next TIP could result in a corrective action and/or FHWA & FTA withholding approval of the 2014-2017 TIP. The Federal Review team opted not to issue a corrective action now, knowing that the new TIP would be developed within the next 8-12 months.

Recommendation 3: SCATS should demonstrate fiscal constraint by year for its entire program of projects. In particular, Table 4-2 in the 2012-2015 TIP should be revised to eliminate negative balances in SCATS sub-allocated funding programs (STP, CMAQ, and TE) as is shown for FY 2013. Additionally Table 4-1 should be consistent with Table 4-2, in that the revenues and costs (particularly those associated with SCATS sub-allocated funds) should be accurately reflected.

Recommendation 4: Resolutions amending the TIP should list sufficient descriptive material to identify each project being amended regardless of project type (highway or transit). This identifying information should be included within the resolution language and not as an attachment. Including the project information as part of the signed resolution allows SCATS to demonstrate that the board has taken action on specific projects; attachments can be separated and/or changed.

FINANCIAL PLANNING & METROPOLITAN TRANSPORTATION PLAN

Regulatory Basis: Requirements for development and content of the Metropolitan Transportation Plan (MTP) can be found in 23 CFR 450.322. Pursuant to 23 CFR 450.322(b), *“The transportation plan shall include both long-range and short-range strategies/actions that lead to the development of an integrated multimodal transportation system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.”*

Status: On May 26, 2009, the SCATS Policy Committee approved its MTP: *Year 2030 Transportation Plan for Stark County, Ohio*. Major sections of the plan consist of: goals, objectives, and strategies; traffic safety and congestion; transportation security; demographic projections; and various appendices on subjects including air quality analysis, financial planning, environmental justice, and environmental mitigation and consultation. The MTP highlights the various findings of recent reports generated in relation to safety, congestion, freight, transit, and bicycle/pedestrian facilities. The recommendations from these documents are integrated into the plan. Additional areas evaluated in other sections of the certification review report are: environmental justice,

safety, air quality, and public involvement.

Fiscally constrained year of expenditure funding estimates using appropriate inflation rates have been developed for the recommended highway and transit projects. The inflation rate (2% compounded annually) is allocated to the projects through 2030 using appropriate aggregate ranges/bands. Revenues are forecasted using reasonable inflation rates (between 2-3% annually).

Findings: SCATS Metropolitan Transportation Plan meets the requirements of 23 CFR 450.322.

TRANSPORTATION SAFETY PLANNING

Regulatory Basis: SAFETEA-LU requires MPOs to consider safety as one of eight planning factors. As stated in 23 CFR 450.306 (a)(2), the metropolitan transportation planning process shall provide for consideration and implementation of projects, strategies, and services that will increase the safety of the transportation system for motorized and non-motorized users.

Status: SCATS has continued a collaborative and data-driven approach to safety planning, including posting of an annual crash report on its website. The annual crash report developed by SCATS incorporates several safety performance measures including total number of fatal and injury crashes for the last three years. SCATS utilizes the annual crash report to assist in TIP project selection and prioritization. Law enforcement, local agencies and project sponsors utilize the report as a basis for decision-making. SCATS annual commitment ensures that safety is integrated into the region's short and long range planning efforts.

Findings: SCATS considers safety as required by 23 CFR 450.306 (a)(2) in their metropolitan transportation planning process.

Commendation 2: SCATS continuously incorporates safety performance measures within their transportation planning process resulting in meaningful decisions regarding transportation investments for the region.

COORDINATION AND PUBLIC TRANSIT

Regulatory Basis: SAFETEA-LU requires that proposed projects funded under the 5310 – Elderly Individuals & Individuals with Disabilities, 5316- Job Access & Reverse Commute (JARC), and 5317 – New Freedom programs should be coordinated and consistent with the metropolitan transportation planning process as stated in 23 CFR 450.306 (h).

Status: Coordination and consultation involving the Section 5316 and Section 5317 programs is accomplished jointly by SARTA and the Stark County Mobility Coordination Committee. The Committee is composed of volunteer members of various non-profit and for-profit agencies and companies interested in assisting Stark County residents with meeting their transportation needs operating under bylaws adopted on

October 24, 2008 (with revisions). Active members include representatives of SARTA, SCATS, Goodwill Industries, ABCD, Inc., Koala Kruisers, Timken Mercy Hospital, Trillium Family Solutions, the SARTA Passenger Committee, American Red Cross, Stark County Dept. of Jobs & Family Services, and others.

SARTA, as the grant manager (and designated recipient) for the 5316 and 5317 funds, provides notices of Committee meetings, performs minutes recording and distribution, provides the meeting location and notices, and other operational support to the Committee, including advertising Requests for Proposals for the grant programs. SARTA is also in the process of revising the locally developed coordinated public transit-human services transportation plan since they have been awarded a Veteran's Transportation and Community Living Initiative grant.

The Committee develops grant applications, review standards and processes, and the review and awarding of grants in accordance with published FTA requirements, including determining project consistency with FTA regulations and the locally developed coordinated public transit-human services transportation plan. SCATS participates as an active member of the Committee, assisting in the development of applications, the development of application review criteria, and assists in the application and review process on various sub-committees.

The Section 5310 program (Transportation for Elderly Persons and Persons with Disabilities- referred to as Specialized Transportation by ODOT) is managed entirely by ODOT. SCATS assists with public relations (notifying potential local applicants), the application process (SCATS' collects and forwards completed applications to ODOT) and provides preliminary review and recommendation/ranking of proposed projects.

Findings: SCATS considers coordination as required by 23 CFR 450.306 (h) in their metropolitan transportation planning process. Continued coordination and communication among SCATS, ODOT Office of Transit and SARTA for the inclusion of eligible items in the TIP is suggested.

AIR QUALITY

Regulatory Basis: The statutory basis for transportation conformity is found in the Clean Air Act Amendments (CAAA) of 1990. Section 176 (c)(1) of the CAAA states: "*No metropolitan planning organization designated under section 134 of title 23, United States Code, shall give its approval to any project, program, or plan which does not conform to an implementation plan approved or promulgated under section 110.*"

SAFETEA-LU reinforced the need for coordinated transportation and air quality planning through the metropolitan planning provisions. The conformity provisions are interpreted through regulations that set out the procedures and criteria for compliance. The regulations governing implementation requirements are included in the Environmental Protection Agency's (EPA) transportation conformity rule (40 CFR Parts 50 and 93) and the metropolitan transportation planning regulations (23 CFR 450 and 49 CFR 613).

Status: The Canton-Massillon area (which includes all of Stark County) is designated as a non-attainment area for PM 2.5 for both the annual and daily standards. Additionally, the area is designated as maintenance area for the 1997 eight-hour ozone standard. SCATS works with ODOT to develop conformity analyses for their MTP and TIP. SCATS prepares travel demand forecasting model networks for the appropriate analysis years, along with the population, employment, and other land-use and socio-economic factors. This input data is provided to ODOT Central Office, where the SCATS travel demand model is run for each analysis year. ODOT Central Office also runs the air quality emissions model (Mobile 6.2 - soon to be transitioned to MOVES). Using output from both the travel demand model and the emissions model, ODOT uses a post-processing program to develop emissions by analysis year for the region. SCATS, ODOT, and OEPA have an agreement detailing their respective roles in carrying out the conformity process. The agreement is dated 2008. SCATS MTP and TIP were last found to conform on July 1, 2011.

Finding: SCATS is in compliance with the conformity requirements of the CAAA, SAFETEA-LU, and the transportation conformity rule.

TITLE VI, ENVIRONMENTAL JUSTICE (EJ) AND LIMITED ENGLISH PROFICIENCY (LEP)

Regulatory Basis: 23 CFR 450.210 identifies requirements for public involvement in the development and carrying out of the statewide transportation planning process. The planning regulations 23 CFR 450.334 (a)(3) require FHWA and FTA to certify that the planning process is being carried out in accordance with all applicable requirements of Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C 2000d-1) and 49 CFR part 21.

Executive Order 12898 provides that “*each Federal agency shall make achieving Environmental Justice part of its mission by identifying and addressing, as appropriate, disproportionately high or adverse human health and environmental effects of its programs, policies, and activities on minority populations and low income populations . . .*”. The planning regulations, 23 CFR 450.316 (a)(1)(vii), require that the needs of those “traditionally underserved” by existing transportation systems, such as low-income and/or other minority households that may face challenges accessing employment and other services, be sought out and considered.

Executive Order 13166 directs federal agencies to evaluate services to Limited English Proficient (LEP) persons and implement a system that ensures that LEP persons are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency.

Status: SCATS adopted a revised Title VI Policy in May 2010. This was an emphasis in the Work Program during that program year. There have been no Title VI complaints filed. For the EJ analysis, a question regarding the lack of separation of minority groups was raised; however, through discussions it was explained that with exception of the black population, most groups were less than 1% of the population. Focus of community

outreach efforts is typical through Wards and Council Members. In addition there are 53 Neighborhood Associations in Canton along with the Stark County Community Foundation. This method of involvement has proved to be effective. In addition, SARTA has organized a Travel Training/Mobility Management program with the intended purpose of promotion, enhancement and facilitation of access to transportation services, including the integration and coordination of services for individuals with disabilities, older adults, and low-income individuals. As part of this effort SARTA has worked with a Hispanic organization and have provided translators.

Finding: SCATS is in compliance with Title VI, EJ and LEP requirements. The Public Participation Plan is a nimble document and should the demographic make-up of the region alter, SCATS will be able to provide continued reasonable opportunity for involvement and engagement in the process.

FTA is in the process of incorporating public comments and will be issuing new guidance on EJ with anticipated publication in Summer 2012. As a reminder, when SARTA undergoes a major service change or a fare increase, a Service and Fare Equity Analysis must be completed and submitted to FTA's Office of Civil Rights.

Unified Planning Work Program Development (UPWP)

Regulatory Basis: 23 CFR 450.308 identifies the requirements for the unified planning work programs (UPWP) to be prepared in TMAs. Pursuant to 23 CFR 450.308, each MPO is required to develop a UPWP in cooperation with the State and public transit agencies. Elements of the UPWP include activities to be completed with sufficient detail as to who will perform the work, schedule, intended products, proposed funding by activity/task, and a summary of total amounts including sources of Federal and matching funds.

Status: SCATS provides an annual UPWP to ODOT for their coordinated review with FHWA and FTA for acceptance. Generally from year to year, the quality of the UPWP for SCATS has been satisfactory. SCATS summarizes the funding sources and work products for each element in a succinct and simple manner. During the site visit, FHWA expressed their preference for SCATS to indicate the use of carryover funds for each work element within this summarized format for each work element.

Finding: SCATS was found to meet the requirements of 23 CFR 450.308.

INTEGRATING FREIGHT IN THE TRANSPORTATION PLANNING PROCESS

Regulatory Basis: SAFETEA-LU legislation specifically calls for the need to address freight movement as part of the transportation planning process. Requirements for addressing freight movement as part of the transportation planning process can be found within three of the eight planning factors in 23 CFR 450.306(a). These freight-related factors include the following:

- Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency.

- Increase the accessibility and mobility of people and for freight.
- Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight.

Status: SCATS is committed to a multimodal approach to transportation planning including the integration of freight considerations within their metropolitan transportation planning activities. SCATS has engaged many entities and partners in freight related projects including the Wheeling & Lake Erie Railway and Stark Development Board. SCATS also includes active representation of the freight community on their Citizens' Advisory Council and Policy Committee.

Finding: Addressing freight movement is integrated within the transportation planning process at SCATS in accordance with 23 CFR 450.306(a).

PUBLIC MEETING SUMMARY

A public meeting was held from 5:00PM until 6:00PM on Monday, March 26 at the offices of the Stark County Regional Planning Commission (the Stark County Regional Planning Commission is the handling agency for SCATS). Representatives from SCATS, SARTA, the Federal Review Team, and ODOT were in attendance. There were no members of the general public in attendance. The public was also provided the opportunity to submit comments until April 2, 2012 if they were not able to attend the public meeting. There were no comments received.

Appendix D contains a copy of public notice published in the Canton Repository on March 19, 2012 and the public meeting sign-in sheet.

CLOSEOUT MEETING

A close-out meeting was held on March 27, 2012 following the two day discussions and public meeting. This meeting provided SCATS with a preliminary indication of the Federal Review Team's impressions of the proceedings and outlined proposed recommendations and commendations. Those present were informed that the Federal Review Team would recommend that the transportation planning process for the Canton TMA be certified. It was agreed that SCATS would be provided a draft copy of the report to check for accuracy in advance of the final report being issued.

SUMMARY OF FINDINGS OF THE REVIEW TEAM

It is the conclusion of the Federal Review Team that the Stark County Area Transportation Study (SCATS), ODOT, and SARTA have made commendable efforts to demonstrate their implementation of SAFETEA-LU requirements, as reflected in the “3-C” planning process. Based upon the findings of this review, the Canton TMA transportation planning process is found to meet the requirements of the metropolitan planning regulations found in 23 CFR Part 450 Subpart C and 49 CFR Part 613. FHWA and FTA, therefore, jointly certify the transportation planning process for the Canton TMA with the following commendations and recommendations.

Commendations:

Commendation 1: SCATS is commended for its project-level documentation of long-term debt (i.e. State Infrastructure Bank (SIB) loans) within its TIP. This complete financial data is essential for demonstrating and maintaining a fiscally constrained program. This transparency also provides a benefit to the public, allowing greater understanding of the federal funds that are available for transportation investments as the region prepares for future needs.

Commendation 2: SCATS continuously incorporates safety performance measures within their transportation planning process resulting in meaningful decisions regarding transportation investments for the region.

Recommendations:

Recommendation 1: SCATS, SARTA, and ODOT should update their various agreements and prospectus to include specific provisions for cooperatively developing and sharing information related to the development of financial plans that support the metropolitan transportation plan and the TIP, as required by 23 CFR 450.314(a).

Recommendation 2: In developing the 2014-2017 TIP, SCATS should show the total estimated cost of each project, as required by 23CFR450.324(e)(2). Total estimated costs include those costs associated with the project, including those phases that may occur in previous or later years beyond the four-year TIP. SCATS is encouraged to review other Ohio MPO TIP formats for examples of how to meet this requirement. Failure to include this information in the next TIP could result in a corrective action and/or FHWA & FTA withholding approval of the 2014-2017 TIP. The Federal Review team opted not to issue a corrective action now, knowing that the new TIP would be developed within the next 8-12 months.

Recommendation 3: SCATS should demonstrate fiscal constraint by year for its entire program of projects. In particular, Table 4-2 in the 2012-2015 TIP should be revised to eliminate negative balances in SCATS sub-allocated funding programs (STP, CMAQ, and TE) as is shown for FY 2013. Additionally Table 4-1 should be consistent with Table 4-2, in that the revenues and costs (particularly those associated

with SCATS sub-allocated funds) should be accurately reflected.

Recommendation 4: Resolutions amending the TIP should list sufficient descriptive material to identify each project being amended regardless of project type (highway or transit). This identifying information should be included within the resolution language and not as an attachment. Including the project information as part of the signed resolution allows SCATS to demonstrate that the board has taken action on specific projects; attachments can be separated and/or changed.

Other Suggestions

During the site visit the federal review team noted two other items that the federal review wanted to highlight below. These are merely suggestions that SCATS intends to address.

- **Website** – The federal review team found the website difficult to navigate in order to find necessary documents and information. In addition, the website included outdated references. SCATS indicated that the website is in the process of being updated to improve upon navigability and ensure references are current.
- **Funding References** – Throughout several documents, the proper names of funding sources were inaccurate. SCATS, ODOT and SARTA agreed to review references so inaccuracies are eliminated in the future.

US DOT CERTIFICATION ACTION AND FOLLOW-UP

Under the provisions of SAFETEA-LU, this USDOT certification action remains in effect for a period of four years from the date of the signed letter accompanying the transmittal of this report, unless a new certification determination is made sooner. Joint FHWA/FTA actions on future products of the Canton TMA's planning process (i.e., UPWPs, MTP, TIPs, and conformity determinations) will be partially based on the progress made by the TMA's planning process partners in addressing these certification review findings.

APPENDIX A

Notification of Certification Review



U.S. Department
of Transportation
**Federal Highway
Administration**

Ohio Division

January 3, 2012

200 North High Street, Rm 328
Columbus, Ohio 43215
614-280-6896
614-280-6876
@dot.gov

In Reply Refer To:
HDA-OH

Ms. Donna Middaugh
Chair
Stark County Transportation Study (SCATS)
201 Third Street N.E., Suite 201
Canton, Ohio 44702

Dear Ms. Middaugh:

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) will be conducting a Certification Review of the transportation planning process for the Canton metropolitan area over the next few months. FHWA and FTA views the Certification Review as an opportunity to cooperatively assess the transportation planning process within your region per requirements in The Safe, Accountable, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU). A Certification Review is accomplished through three phases including a desk review, field review, and documentation of the reviews in a report.

The desk review is scheduled for February 7, 2012. The intent of the desk review is for FHWA and FTA to identify any items or issues requiring specific discussion and evaluation during the field review. A review of SCATS' planning documents, including the current work program, Transportation Plan, TIP, and other documents will be conducted as part of the desk review. After completion of the desk review a list of items and issues identified for further review and discussion during the field review will be provided to your staff.

As coordinated and confirmed with your staff, the field review portion of the certification is scheduled for March 26-27, 2012. The field review will be conducted at the SCATS office where the review team consisting of staff from the FHWA Ohio Division and FTA Region 5 will meet with your staff, representatives of the transit operators and the Ohio Department of Transportation (ODOT). As part of the field review, the review team will be available to listen to statements from the public, elected officials and special interest groups on the evening of Monday, March 26, 2012. Representatives from SCATS, ODOT, transit operators, and other interested parties are welcome to attend this public forum. At the end of the field review, a close out meeting will be held with your staff to summarize preliminary findings. You and members of the SCATS Policy Committee are welcome to attend any or all parts of the field review.

The review team will then prepare a report documenting the desk and field reviews. This report will include a summary of the issues discussed and any corresponding findings and/or recommendations. Accompanying the delivery of the final report, the FHWA Ohio Division Office and the FTA Region 5 Office will also provide a joint certification finding.

This Certification Review is being done in the spirit of cooperation with the goal of enhancing the quality of the transportation planning process in the Canton area. We will continue to work with your staff in this process to finalize activities surrounding the field review. If you should have any questions or comments, please contact Mr. Andy Johns of FHWA at 614.280.6850 or Ms. Susan Weber of FTA at (312) 353-3888.

Sincerely,



For: Laura S. Leffler
Division Administrator

APPENDIX B

Post Desk Review Correspondence and Questions/Comments

Johns, Andy (FHWA)

From: Johns, Andy (FHWA)
Sent: Friday, February 10, 2012 8:14 AM
To: 'Jeffrey Dutton'
Cc: Sara.Walton@dot.state.oh.us; Jim Kinnick (james.kinnick@dot.state.oh.us); Kirt Conrad (kconrad@sartaonline.com); Marianne Freed (marianne.freed@dot.state.oh.us); Weber, Susan (FTA); Adams, Vanessa (FTA); Oesterling, Leigh (FHWA); Oesterling, Leigh (FHWA); Price, Neosha (FHWA)
Subject: SCATS Certification Review - Draft Agenda, Topics for Discussion and Questions/Comments for Consideration
Attachments: Draft Agenda Site Visit.pdf; FHWA_FTAQuestionsSCATS.docx

Mr. Dutton:

As part of SCAT's Certification Review, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) conducted a desk review on February 7, 2012. During the desk review, the federal review team identified the following topics that require specific discussion during the site visit. These items include:

- Agreements and Contracts,
- Financial Planning,
- Transportation Planning Safety,
- Coordination and Public Transit,
- Air Quality Planning,
- Title VI and Environmental Justice,
- Unified Planning Work Program Development, and
- Integrating Freight in the Transportation Planning Process

To assist you and your staff in preparing for the site visit, attached is a list of questions/comments prepared by the federal review team by topic area including a section on overall comments. We ask that SCATS review the above topics and attached list of questions/comments to be prepared to discuss in detail during the site visit. At your discretion, you may provide the federal review team with written responses to any or all of the questions prior to the site visit.

The site visit portion of the certification is scheduled for Monday and Tuesday, May 26-27, 2012. The site visit will be conducted at the SCATS office where the federal review team will meet with your staff, representatives of the transit operator and the Ohio Department of Transportation (ODOT). As part of the site visit, the review team will be available for the public to express their views on the transportation planning process in the Canton area at an open public meeting on the evening of Monday, March 26, 2012 from 5:00PM until 6:00PM at SCATS. Representatives from SCATS, ODOT, transit operators, and other interested parties are encouraged to attend this public meeting.

Please review and provide any comments on the attached draft agenda for the site visit by February 22, 2012. As you will see on the agenda, the review team requests to be placed on the Policy Committee agenda to briefly describe the purpose of the certification review.

We also appreciate SCATS' willingness to assist us with the advertising and logistics of the public meeting. After providing concurrence with the draft agenda, we will provide a public notice for SCATS to use. We ask that SCATS save the official notice and provide to us documentation that it has been advertised so we may include in the certification review report.

If you should have any questions or comments, please contact me or Ms. Susan Weber of FTA at (312) 353-3888.

Respectfully,
Andy Johns
FHWA - Ohio Division
614.280.6850

Questions for SCATS Certification Review

FHWA/FTA targeted questions in **BOLD** and provided additional questions as a guide for site visit discussions. Responses from SCATS are in *italics*. Additional documentation referenced within the responses from SCATS are available with the FHWA Ohio Division or SCATS.

Progress on Recommendations from previous Certification Review

1. How has SCATS considered Recommendation One from the previous certification review to “revisit the amount of FTA Section 5307 funding available for the forecast period, include the local match and program the Section 5316 JARC and Section 5317 New Freedom Funds”?

SCATS 2010 update of the LRP made appropriate adjustments to the 5307 funding as recommended.

2. How has SCATS considered Recommendation Two from previous certification review to “update the regional ITS architecture, including farebox upgrades; and ensure that projects comply with the provisions of 23CFR940”?

Yes, SCATS will update the regional architecture to incorporate projects associated with transit ITS improvements once they have been successfully completed. Many of the previous ITS transit projects (Automatic Vehicle Locators (AVL), automated dispatch, automatic passenger counts, etc.) failed installation testing on the proposed beta system and the contract was terminated.

SARTA has recently awarded its Advanced Communication System (ACS) contract to AVAIL Technologies, Inc., which has made successful installations on 20 transit systems, and is in the process of scoping the contract. This project will include (as proposed) AVL, automated dispatch, automated arrival/departure announcements on bus, automated arrival/departure announcements at stations, automated arrival/departure smart phone apps, automated cell phone inquiries and other features to be installed in phases.

SCATS will review the project components for compliance with Subchapter K, part 940, once SARTA’s proposed system specifications and contract have been finalized. As proposed, the components match numerous National Architecture process specifications. However, due to rapidly evolving technologies in ITS transit projects, and potential integration difficulties with existing software and hardware, we will complete the update to the regional architecture once the proposed system installation has been completed, accepted by SARTA, and is operating successfully.

Agreements and Contracts

1. **Does an agreement exist with the State and Transit Operators that documents the responsibilities for each agency in carrying out the metropolitan transportation process. (23 CFR 450.314(a))**

SARTA operates under a master agreement with the Federal Transit Administration and executes individual agreements for each grant received from ODOT. Also, a copy of the signed agreement between SARTA and SCRPC/SCATS is included herein as an attachment.

2. Please provide a copy of the agreement between SCATS, the county, incorporated municipalities, and the public transit operators for carrying forward the transportation planning process as required per Section VI of the ODOT-SCATS biennium agreement.
3. Please provide a copy of the agreement between SCATS, ODOT, and OEPA, as required per Section VI of the ODOT-SCATS biennium agreement.
4. **Please provide a copy of the agreement between SCATS and OEPA describing their respective roles and responsibilities, as required by 23 CFR 450.314(c).**
5. Describe the process for how SCATS shares data and information with Eastgate and AMATS, particularly when dealing with a project that crosses the MPO borders. Specifically, how are determinations made about travel demand modeling, such as external trip tables. Also, is there a documented process for managing disputes between the MPOs?

Whenever possible and appropriate, we share data with AMATS and Eastgate. We used to have quarterly meetings with AMATS, Eastgate, and ODOT D4 to make sure that we were all on the same page. We don't have quarterly meetings anymore, but we still meet at least once a year. As far as travel demand modeling, whenever we do an external forecast, which is part of every long-range plan update, we make sure to use the same numbers along our common borders. If we should ever have a disagreement, we usually settle the issue through emails or phone calls. If necessary, we would meet face-to-face. I don't think there is a documented process for managing disputes.

Financial Planning

Following Questions relate to the Transportation Improvement Program (TIP)

1. **Page 4-2 states that other agencies (specifically "ODOT Program Managers") are responsible for fiscal constraint. How does SCATS work with these agencies to demonstrate fiscal constraint of the TIP, per 23 CFR 450.324(h)?**
SCATS staff confers with ODOT fiscal managers on a regular basis both in Columbus and District 4 to assure that projects are continually updated and SCATS TIP is fiscally constrained. We also monitor projects through the ELLIS system.
2. **What is the process for working cooperatively with the State and Transit Operators to determine revenue committed and reasonably expected to be available? (23 CFR 450.314(a) and 23 CFR 450.324(h))**
SCATS staff confers on a regular basis with fiscal agents from SARTA as well as ODOT Transit regarding available funding. Identifying transit projects with PID numbers also facilitates the process by allowing SCATS staff to review project information through ELLIS.
3. **Why are the "Budget" and the "Estimate" columns exactly equal? Why does the "Budget" change randomly from year to year (on the highway side)?**
In most cases, the estimated project costs were identified prior to the preparation of the 2012-15 TIP document. The budgeted allocation to meet the pro-forma costs were set to meet costs and provide for fiscal constraint
4. **Table 4-2 does not adequately demonstrate fiscal constraint of the MPO sub-allocated funding sources. For example, STP, CMAQ, and TE are all shown as negative balance in the year 2013. Please describe the process used to demonstrate fiscal constraint (by year), per 23 CFR 450.324(i)**

In years when a particular project phase cost exceeds the budgeted allocation, SCATS requests that funds are made available from prior or future years.

- 5. Where within the TIP is the total cost of each project documented, as required by 23 CFR 450.324(e)(2).**

Project costs are identified by phase and fiscal year – SCATS staff will review software capacity for showing total cost.

- 6. How are project cost estimates determined? What triggers an update of a cost estimate within the TIP?**

Typically, SCATS looks to project sponsors to identify project costs in addition to reviewing ELLIS – as we are advised of cost changes, the TIP is adjusted accordingly.

- 7. How does SCATS document consistency between the TIP financial plan and the MTP financial plan? (Appendix B of MTP and Table 4-1 are not consistent.) (23 CFR 450.324(l))**

SCATS staff frequently reviews TIP projects to assure consistency with the LRP.

- 8. How do SCATS, ODOT, and the Transit Operators work together to demonstrate consistency between the TIP and STIP financial plans? (23 CFR 450.314(a) and 23 CFR 450.216(l))**

Information flows among SCATS, SARTA and ODOT (D4 and CO). TIP and STIP amendments originate from varying sources, but through communication and monitoring of projects on ELLIS, the TIP and STIP are coordinated.

- 9. What is the process for modifying or amending the TIP? Are there administrative modification procedures in place? (23 CFR 450.326)**

TIP amendment request usually originate from the project sponsor and then flow to SCATS staff for inclusion on the agenda for consideration by the Policy Committee. SCATS adopted a resolution (2008-17) in June of 2008 permitting Administrative Modifications. The authority has been used very sparingly, if at all, since its adoption.

- 10. How is coordination done with ODOT in the TIP/STIP process?**

During preparation of the TIP/STIP, SCATS staff exchanges information with ODOT Central and D4 utilizing an exchange of information through ELLIS, Telephone and/or ODOTs Extranet Site where documents can be placed for review by anyone having access.

- 11. Have you considered Land Use/Livability measures in the STP/CMAQ Project Priority Rating System?**

SCATS Priority Rating System includes consideration for land use types, safety, congestion mitigation (improved traffic flow), system preservation and multi-modal factors (funding for buses, bike/pedestrian, and alternative fuel vehicles

- 12. What is the current Public Involvement Plan? Currently in searching the website, there is a Public Involvement Process, Draft August 2006.**

The plan shown on the website is currently the one being utilized and should not be labeled draft as it was adopted by the Policy Committee in 2006. Staff will correct that.

- 13. Would like to discuss the information in the Transit Project Table, page 3-4.**

Following Questions relate to the Metropolitan Transportation Plan (MTP)

- 1. Describe the process SCATS uses to forecast revenue projections. How do ODOT and SARTA cooperatively participate in this process?**

In most cases, future funding is projected based upon past funding trends modified using an appropriate growth rate. The precision of this process varies widely based upon the consistency of allocating funds in the past. SCATS staff looks to ODOT and SARTA for input as to the available of funds into the future.

- 2. The MTP financial plan relies on “population formulas” to determine SCATS “fair share” of federal/state revenues. Has SCATS looked at historic financial data to verify if this methodology is reasonable? It is not clear if the FY 2009 Allocation is the actual allocation or the “fair share” calculation (Appendix B of 2009 MTP)**

The accuracy of pro-forma projections varies widely with the consistency of past data used to project into the future. In some cases, past funding is consistent enough to identify accurate trends (i.e. SCATS STP allocation) while accuracy of projections are somewhat less precise for sources without consistent trends (like TRAC allocations). Some of the FY2009 allocations are based on actual information, and some are based upon a calculated share. Staff will clarify this issue in the next LRP update.

- 3. Has SCATS started work on the 2013 MTP update? If so, please share work completed to date, specifically regarding the financial analysis.**

Staff is working on work products that will be integrated into the 2013 plan. Focused attention to the update of the plan will begin in April.

- 4. How does SCATS document consistency between the TIP financial plan and the MTP financial plan? (Appendix B of MTP and Table 4-1 are not consistent.)**

SCATS staff reviews the TIP on a regular basis to determine that projects continue to be fiscally balanced.

- 5. How are project cost estimates determined? What triggers an update of a cost estimate within the MTP?**

See response to question 2 above for cost estimate methodology. The information in the budget tables for the LRP are mostly based on long range pro forma estimates whereas the TIP includes more predictable short term estimates. The closer the estimation timeline is to the actual allocation, the more accurate the estimate will be. Most project cost estimates in the MTP are projected out over several years based on estimated time lines of up to 20 years using best available information at the time of completion of the LRP. For projects in the relative near term, the estimates are more accurate as shown in the TIP. As information becomes available for LRP projects scheduled out beyond the TIP time line, the information can be used to update the estimates shown in the LRP.

- 6. Why is \$0 shown in Table 4-1 of the TIP for Section 5309 funds? It appears that the MTP and the TIP are not aligned. Section 5309 funds are now competitively selected projects in the various discretionary grant programs. SARTA has been selected to receive Bus and Bus Livability, State of Good Repair and Veteran’s Transportation and Community Living Initiative grants. For the next MPT update, consider programming future 5309 funds based on reasonable a method.**

The Transportation Plan was developed prior to SARTA receiving 5309 funding for the listed discretionary grant programs and prior to the inception of some of the programs. Guidance in estimating future funds discouraged against speculation concerning potential funding sources, as well as any changes in the motor vehicle fuel tax rate and/or fuel tax exemptions.

Data in Table 4-1 of the TIP is as accurate as possible at the time of publication. There is occasionally a lag in data between SARTA and SCATS concerning proposed, pending, and awarded grants. SCATS has been working to improve communications between agencies.

Transportation Planning Safety

1. How is the safety planning factor considered in your planning process?
SCATS has adopted in the most recent update to The Plan, Objective 4- Provide an efficient, safe and secure transportation system and further a strategy to "Identify and target high crash locations for safety improvements".
2. Are safety performance measures incorporated in the planning process? If so, what metrics are used?
SCATS Crash Report/Safety Work Program is a major component of the UWP each year. Law enforcement and project sponsors utilize the report extensively. A significant portion of the TIP project scoring criteria is safety and awards points based on the ranking from the most recent report. As a result, the number of high hazard intersections in the county has dropped dramatically in recent years.

Coordination and Public Transit

1. **Describe the coordination and consultation process involved with project selection and its consistency with the Human Services Coordination Plan and the use of Section 5310, 5316 5317 funds.**
Coordination and consultation involving the Section 5316 (Job Access and Reverse Commute) and Section 5317 (New Freedom) programs is accomplished jointly by SARTA and the Stark County Mobility Coordination Committee. The Committee is composed of volunteer members of various non-profit and for-profit agencies and companies interested in assisting Stark County residents with meeting their transportation needs operating under bylaws adopted on October 24, 2008 (with revisions). Active members include representatives of SARTA, SCATS, Goodwill Industries, ABCD, Inc., Koala Kruisers, Timken Mercy Hospital, Trillium Family Solutions, the SARTA Passenger Committee, American Red Cross, Stark County Dept. of Jobs & Family Services, and others. SARTA is the grant manager (and designated recipient) for the 5316 & 5317 funds, provides notices of Committee meetings, performs minutes recording and distribution, the meeting location and notices, and other operational support to the Committee, including advertising Requests for Proposals for the grant programs. SARTA is also in the process of revising the locally developed coordinated public transit-human services transportation plan since they have been awarded a Veteran's Transportation and Community Living Initiative grant. The Committee develops grant applications, review standards and processes, and the review and awarding of grants in accordance with published FTA requirements, including determining project consistency with FTA regulations and the locally developed coordinated public transit-human services transportation plan. SCATS participates as an active member of the Committee, assisting in the development of applications, the development of application review criteria, and assists in the application and review process on various sub-committees. NOTE: The Section 5310 program (Transportation for Elderly Persons and Persons with Disabilities- referred to as Specialized Transportation by ODOT) is managed entirely by ODOT. SCATS assists with PR (notifying potential local applicants), the application process (we collect and forward completed

applications to ODOT) and review (we provide a preliminary review and recommendations/ranking of proposed projects).

Air Quality Planning

1. Describe how the air quality transportation conformity process is carried out for the Canton-Massillon, OH designated non-attainment area.

Each time SCATS updates its Long-Range Transportation Plan or creates a new Transportation Improvement Program, it must show that the plans are in conformity with air quality standards. SCATS does this by including an air-quality analysis in the plan document. SCATS also does an air-quality analysis whenever air-quality standards are changed or (as we are currently doing) when the air-quality software is updated. When doing an air-quality analysis SCATS prepares model networks for the appropriate years. These networks are sent to ODOT Central Office. ODOT Central Office runs the air-quality software to determine the emissions caused by traffic. If the emissions are too high, SCATS modifies its plans until the plans are in conformity.

2. **Does an agreement exist between SCATS and OEPA describing their respective roles and responsibilities, as required by 23 CFR 450.314(c)?**

Yes – the agreement will be forwarded to FHWA and ODOT along with this questionnaire.

3. **How has SCATS and ODOT prepared to transition to the new EPA emissions software, MOVES?**

During our last air-quality analysis, completed in the fall of 2010, ODOT ran the emissions calculations in both Mobile 6.0 and MOVES.

4. **What is the status of revising Mobile based budgets for Ozone and PM 2.5 to MOVES based budgets?**

We are currently on schedule. SCATS has nearly completed the necessary model networks. ODOT is in the process of updating Canton's 2009 budget for ozone. The regional conformity analysis isn't due until March, 2013.

Title VI and Environmental Justice

1. **What is the status of the Title VI Plan? DBE plan/goals?**

A revised Title VI Policy was developed and adopted by the SCATS Policy Committee and the Regional Planning Commission in May 2010.

<http://www.co.stark.oh.us/internet/docs/rpc/Title%20VI%20Policy.pdf>

2. What goals, policies, approaches, and performance measurements has the MPO used to address the principles of environmental justice? To identify and meet the needs of Limited English Proficiency (LEP) persons? To determine if the EJ policy is effective?

SCATS performs an EJ analysis for projects in both the Plan and each TIP. The needs of the LEP population are addressed in the updated Title VI Policy. The adopted Public Participation Plan also seeks to "Develop outreach programs to seek out and consider the needs of those traditionally underserved by existing transportation systems, including, but not limited to, low-income and minority households".

3. How does the MPO use census and other data for identifying EJ and LEP populations in the planning process? How is this information used to examine the levels of service provided by existing and proposed transportation facilities and services to those groups, relative to non-EJ and non-LEP populations?

SCATS uses census data to identify low income and minority areas. We tabulate block data by traffic zone or rely on the census transportation planning package. The traffic assignment models are used by SCATS to determine if proposed highway improvements serve each area. No specific identification of LEP populations is included in the process. According to the 2000 Census, 1.2% of Stark County's population Speak English less than "very well". The EJ target area identification examines the levels of service to target and non-target areas.

4. During the planning process, has the MPO developed a demographic profile of the metropolitan planning area that includes identification of the locations of low-income, minority and LEP populations?

Comment: Why does the profile not separate out each minority group? It is currently listed as white vs. non white. The way that the data is presented is not clear. (Title IV Minority Groups: Black, Hispanic, Asian, American Indian and Alaskan Native) Appendix C-page 2

During the initial stage of the Environmental Justice process, SCATS identified target areas for use in the final EJ analysis. Several groups were part of the initial process and later excluded including zero vehicle households and individual minority groups. It was determined to look at minorities as a whole due to the low numbers of those groups being present in the county. With the exception of the black population, most groups were less than 1% of the population. SCATS believes it has a sufficient data profile of the area and that accurate minority and low income areas have been identified.

5. How does the planning process identify the access and mobility needs of low-income, minority and LEP populations?

During the EJ analysis, SCATS examined the median travel times for target and non-target areas, as well as those that rely on transit as a means of the journey to work. SCATS also participates in the administration of the Job Access and Reverse Commute program. While not part of the EJ analysis, SCATS does, on a per project basis, examine the feasibility of additional lane or lane widths to serve the needs of the Amish community in SW Stark County.

6. Does the Public Participation Plan (PPP) include a specific and separate strategy for engaging low-income and minority populations? For engaging LEP populations? If so, what are its main components?

From the adopted PPP: Develop outreach programs to seek out and consider the needs of those traditionally underserved by existing transportation systems, including, but not limited to, low-income and minority households". The Citizens

Advisory Council, a primary link to engaging the public, has varied meeting times and locations, attempting to improve public participation.

- 7. Is there a process to evaluate the effectiveness of public involvement, including its success at engaging low-income and minority residents and LEP persons? If so, how is this process being carried out?**

The PPP has a provision to “Provide for periodic review of the Public Involvement Process to determine effectiveness and explore methods of improving the process”; and “Periodic review of this PIP is planned to ensure compliance with all current local, state, and federal planning regulations governing Metropolitan Planning Organizations (MPO’s) and to provide an on-going workable mechanism for early public involvement in the planning process”.

- 8. Who is responsible for public involvement? How do public involvement activities conducted throughout the metropolitan planning process influence transportation investment decisions and policies of the State and public transit agency?**

SCRPC currently employs a Community Relations Planner. Through the SCATS PPP, the public is encouraged to participate in any and all transportation decisions, whether those of SCATS, ODOT or SARTA. All major planning documents, as well as amendments to The Plan or TIP, including those proposed by ODOT and SARTA, are placed on the RPC website for at least a 20 day comment period.

- 9. Describe the process by which low-income, minority and LEP populations and those “traditionally underserved” can comment on the UPWP, the TIP, the Transportation Plan, and other documents prepared through the planning process.**

The Public Involvement Process involves, but is not limited to, the following: traffic, ridesharing, parking, transportation safety and enforcement agencies; airport/port authorities; private transportation providers; government officials; environmental groups; planning organizations; and transportation consumers. An outreach program seeks specific ways to discover and consider the needs of all segments of the population, especially those traditionally underserved by existing programs, processes, and transportation systems, such as low-income and minority households. This is done to fully involve the citizenry in SCATS planning. In seeking to improve participation, SCATS has varied meeting times and locations for the Citizen’s Advisory Council and public comment meetings held for the transportation plan and TIP. This has included meetings at the Stark County Main District Library, which is centrally located, easily accessible to public transportation and also has free parking.

- 10. How do the MPO and partner agencies respond to comments from low-income, minority and LEP populations?**

From the adopted PPP: Accountability and Response to Citizens- Written and/or verbal citizen comments, proposals, and/or complaints, where appropriate, will be provided a written and/or verbal response within fifteen (15) working days,

and, where pertinent, will be analyzed, summarized, and reported to appropriate authorities and/or person(s).

Planning reports, documents, correspondence, and other relevant written materials maintained in the Stark County Area Transportation Study (SCATS) files at the Stark County Regional Planning Commission (SCRPC) offices are available to the general public during posted regular working hours. A calendar of meeting dates and times is posted for public inspection.

Inquiries made to SCATS and SARTA receive written responses from staff or referrals to appropriate other agencies if necessary. In addition, SARTA provides copies of correspondence to their Board members in meeting board packets.

11. What measures and methods are used to analyze and verify the impacts on low-income and minority populations of multimodal access and mobility performance improvements in the plan and the TIP?

Part of the initial EJ Target Area Identification and Analysis was mapping of the median journey to work times for targeted and non targeted areas. Also mapped were the median times of those relying on public transit for their journey to work. Targeted areas were found to have shorter commutes.

12. Has the region performed an analysis to determine whether there are any language groups that qualify as Limited English Proficient? If so, how has the region reached out to these LEP groups? What steps are taken to address the needs of these individuals? How are these LEP-related activities documented in the MPO's Public Participation Plan? How have EJ and LEP populations been documented? How does the State DOT verify the MPO's policies and related activities?

SCATS has not performed a specific analysis of the LEP population but seeks engage all of those traditionally underserved by existing programs, processes, and transportation systems. SCRPC has produced information in Spanish. In addition to the network of social service agencies, the agency has sought out a number of churches that serve the LEP population. SCRPC has budgeted for the services of an interpreter whether for language or the hearing impaired to make reasonable accommodations for those that require it. A new EJ analysis is included with each Plan or TIP and made part of the draft document that is forwarded to both ODOT and FHWA for comment before the final document is adopted by the SCATS Policy Committee.

Unified Planning Work Program Development

1. How are UPWP activities developed, selected, prioritized?

In conjunction with direction from ODOT and local needs

2. How is the final version approved?

After review by staff, a resolution is adopted by the Policy Committee

3. **How are amendments developed and processed?**

Amendments to the Work Program usually are initiated by staff and once formalized, all amendments are approved by the Policy Committee.

4. **How are carryover funds documented?**

Staff maintains and continually updates a spreadsheet tracking all operating funds. Carryover is included in that spreadsheet for analysis.

Integrating Freight in the Transportation Planning Process

1. How is the freight community engaged in the planning process, particularly in the development of the transportation plan and TIP?

Beyond ordinary PR efforts to engage the public in the planning process, no specific measures are taken to target the freight community.

That being said, SCATS has engaged many entities and partners in freight related projects such as the Stark County Intermodal/Neomodal facility, which involved the Wheeling & Lake Erie Railway, Stark Development Board, and others; the Shuffel Road/IR77 interchange project, which involved the Akron-Canton Airport, Ohio Dept. of Public Safety, etc.; and conceptual planning for the Gracemont interchange, which involved shipping issues with a major landfill operation (with a 7,800 tons per day operating permit), among others.

In many cases the development of projects are needs related, and, as they develop, SCATS seeks the participation of all pertinent partners, including the freight community.

2. Explain how the MPO transportation planning process addresses the requirement under 23 CFR 450.322(b) that:

The MTP shall include both long-range and short-range strategies/actions that lead to the development of an integrated multi-modal transportation system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

Overall Comments

1. Please consider looking at the website. Currently it is difficult to find documents while searching the website and includes outdated references.
2. Throughout the plans, please correctly reflect the proper names of funding sections; currently there are incorrect references/names.

APPENDIX C

Site Visit Agenda and Sign-In Sheets

Site Visit Agenda
SCATS Certification Review
SCATS Office
March 26-27, 2012

Monday, March 26, 2012

- 9:00 A.M. Welcome and Introductions, *Federal Review Team, SCATS*
- 9:05 A.M. Purpose of Federal Certification, *Andy Johns, FHWA*
- 9:15 A.M. Overview of the Transportation Planning Process, *SCATS*
- 9:30 A.M. Begin Discussions (*discussion leader(s) indicated for each topic*)
- Progress on Recommendations from previous Certification Review
(*Andy Johns, FHWA and Susan Weber, FTA*)
 - Agreements and Contracts
(*Leigh Oesterling, FHWA and Susan Weber, FTA*)
 - Financial Planning
(*Leigh Oesterling, FHWA and Susan Weber, FTA*)
- 12:00 P.M. BREAK FOR LUNCH
- 1:30 P.M. Policy Committee Meeting
(*Andy Johns to briefly address Policy Committee on purpose of Federal Certification*)
- 3:00 P.M. Resume Discussions (*discussion leader(s) indicated for each topic*)
- Transportation Planning Safety
(*Susan Weber, FTA*)
 - Coordination and Public Transit
(*Susan Weber, FTA*)
- 5:00PM One-Hour Public Meeting at SCATS Office

*This agenda is a guide. Timeframes of discussions is subject to change.

Tuesday March 27, 2012

8:30 A.M. Resume Discussions (*discussion leader(s) indicated for each topic*)

- Air Quality Planning
(*Leigh Oesterling, FHWA*)
- Title VI and Environmental Justice
(*Leigh Oesterling, FHWA and Susan Weber, FTA*)
- Unified Planning Work Program Development
(*Andy Johns, FHWA*)
- Integrating Freight in the Transportation Planning Process
(*Andy Johns, FHWA*)

10:30AM Internal Federal Review Team Meeting

11:30AM Federal Review Team presents preliminary findings to SCATS
and discusses Next Steps

12:00PM Adjourn

*This agenda is a guide. Timeframes of discussions and adjournment is subject to change.



201 3rd Street NE, Suite 201, Canton, Ohio 44702-1211

FAX: 330-451-7990

Web site: www.rpc.co.stark.oh.us

Date March 26, 2012

Time 9:00 a.m.

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APPENDIX D
Public Meeting Notice and Sign-In Sheet

The Repository 3/19/12

**SCATS Federal Certification Review
Public Notice**

The Federal Highway Administration (FHWA) and Federal Transit Authority (FTA) are providing an opportunity for you to express your views on the transportation planning process in the Canton area in an open public meeting. The meeting will be held from 5:00 PM until 6:00 PM on Monday, March 26th at the offices of the Stark County Regional Planning Commission located at 201- 3rd ST. NE, Suite 201, Canton, OH 44702.

This public meeting is part of a review that will assess compliance with Federal regulations pertaining to the transportation planning process conducted by the Stark County Area Transportation Study (SCATS), the Ohio Department of Transportation (ODOT), Stark Area Regional Transit Authority (SARTA), and local units of government in the Canton area.

If you are unable to attend the meeting in person, comments will be accepted until April 2, 2012 to either of the following individuals:

Mr. Andy John
Federal Highway Administration
200 North High Street, Suite 328
Columbus, OH 43215

Ms. Susan Weber
Federal Transit Administration
200 West Adams Street, Suite 320
Chicago, IL 60606

Persons with disabilities needing assistance are asked to contact Regional Planning at 330-451-7389 at least two days in advance.

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